

**Fill in this information to identify the case:**

Debtor 1 Erick Johnson

Debtor 2 Carmen Kitts Johnson aka Carmen Kitts  
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania  
(State)

Case number 16-bk-04101-HWV

**Official Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

**According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.**

**Part 1: Mortgage Information**

Name of creditor: M&T Bank

Court claim no. (if known): 3

Last 4 digits of any number you use to identify the debtor's account: 4307

Property address:

**9005 Carlisle Road  
Wellsville, PA 17365**

**Part 2: Prepetition Default Payments**

*Check one:*

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

*Check one:*

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with §1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.

The next postpetition payments from the debtor(s) is due on: 05/01/2022  
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with §1322(b)(5) of the Bankruptcy Code, include all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payments(s) that first became due on:

    /    /      
MM/DD/YYYY

**Part 4:** Itemized payment History

If the creditor disagrees in Part 2 that the prepetition arrearage had been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5:** Sign Here

The person completing this Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number.

Check the appropriate box:

- ☐ I am the creditor.
- ☒ I am the creditor's attorney or authorized agent.

**I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief:**

X /s/ Daniel P. Jones Date April 26, 2022  
Signature

Print: Daniel P. Jones  
First Name Middle Name Last Name

Title: Attorney for Creditor

Company Stern & Eisenberg, PC

If different from the notice address listed on the proof of claim to which this response applies:

Address:

1581 Main Street, Suite 200  
The Shops at Valley Square  
Warrington, PA 18976

Contact phone (215) 572-8111

Email: djones@sterneisenberg.com

Certificate of Service

I hereby certify that a copy of the foregoing Response to Notice of Final Cure Payment was served on the parties listed below by postage prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on this Date.

Date: April 26, 2022

Dawn Marie Cutaia  
Pugh and Cutaia, PLLC  
115 East Philadelphia Street  
York, PA 17401  
dmcutaia@gmail.com  
***Counsel for Debtor***

Jack N Zaharopoulos  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
info@pamd13trustee.com  
***Chapter13 Trustee***

Office of the U.S. Trustee  
228 Walnut Street  
Suite 1190  
Harrisburg, PA 17101  
ustpreion03.ha.ecf@usdoj.gov  
***U.S. Trustee***

and by standard first class mail postage prepaid to:

Erick Johnson  
9005 Carlisle Rd.  
Wellsville, PA 17365

Carmen Kitts Johnson aka Carmen Kitts  
9005 Carlisle Rd.  
Wellsville, PA 17365  
***Debtor(s)***

By: /s/ Daniel P. Jones  
Daniel P. Jones, Bar No: 321876  
Stern & Eisenberg, P.C.  
djones@sterneisenberg.com  
Counsel for Movant